



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

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Commissioner

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(800) 451-6027
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March 24, 2003

Mr. James Shafer
Covermaster, Inc.
57784 C. R. 3
Elkhart, IN 45617

Re: 039-16534
Minor Source Modification to
Part 70 Permit No.: 039-7354-00137

Dear Mr. Shafer:

Covermaster, Inc. was issued a Part 70 permit on April 18, 2001, for the operation of a stationary fiberglass truck cap and component manufacturing source. An application to modify the source was received by the Office of Air Quality (OAQ) on December 3, 2002. The modification will increase the usage of adhesive at the two (2) existing adhesive application areas. Pursuant to 326 IAC 2-7-10.5, the following emission units are approved for construction at the source:

Plant #1 (57784 C. R. 3):

Adhesive application area identified as ADH-01, installed in April 2002, equipped with a high volume low pressure (HVLP) spray application system consisting of two (2) application guns for adhesive application with dry filter for particulate overspray control, and exhausting at two (2) stacks identified as ADV-01 and ADV-02.

Plant #2 (57784 C. R. 3):

Adhesive application area identified as ADH-02, installed in April 2002, equipped with a high volume low pressure (HVLP) spray application system consisting of two (2) application guns for adhesive application with dry filter for particulate overspray control, and exhausting at two (2) stacks identified as ADV-03 and ADV-04.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

The source may begin construction when the minor source modification has been issued. Operating conditions shall be incorporated into the Part 70 operating permit as a minor permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Michael Hirtler, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or at 973-575-2555, extension 3229, or in Indiana at 1-800-451-6027.

Sincerely,

Original signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
MH / EVP

c: File - Elkhart County
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Paul Karkiewicz
Compliance Data Section - Karen Nowak
Administrative and Development
Technical Support and Modeling - Michele Boner



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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Covermaster, Inc.
57784 C.R. 3
Elkhart, Indiana 46517**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

First Minor Source Modification No.: 039-16534	Pages Modified: 2-4, 6, 6a, 7, 26, 26a, 45, 47a, 47b
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: March 24, 2003

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- (e) One (1) spray paint booth identified as B-6, constructed October 20, 1995, coating a maximum of 8.125 fiberglass units per hour, equipped with a high volume low pressure (HVLP) spray application system consisting of two (2) spray guns and dry filter for particulate matter overspray control, and exhausting at four (4) stacks collectively identified as SV-6.
- (f) One (1) gel coat application booth identified as B-7, producing a maximum of 10 fiberglass truck caps and parts per hour, equipped with a high volume low pressure (HVLP) spray application system consisting of three (3) spray guns for color changes, using only one (1) gun at a time, and dry filter for particulate matter overspray control, and exhausting at one (1) stack identified as SV-7.
- (g) One (1) resin chop coat booth identified as B-8, producing a maximum of 10 fiberglass truck caps and parts per hour, equipped with one (1) flow coater chop gun and dry filter for particulate matter overspray control, and exhausting at one (1) stack identified as SV-8.
- (h) Two (2) product preparation booths, identified as Prep Booth B-1 and Prep Booth B-2, containing grinders, cutters and buffers and processing up to a total of 650 pounds of fiberglass product per hour, each equipped with a filter bank system for particulate matter control and exhausting inside the building.
- (i) Adhesive application area identified as ADH-01, installed in April 2002, equipped with a high volume low pressure (HVLP) spray application system consisting of two (2) application guns for adhesive application with dry filter for particulate overspray control, and exhausting at two (2) stacks identified as ADV-01 and ADV-02.

Plant #2 (57784 C. R. 3):

- (a) One (1) paint booth constructed July 16, 1998, coating a maximum of 195 fiberglass truck caps per day, equipped with a high volume low pressure (HVLP) spray application system consisting of one (1) basecoat gun and one (1) clear coat gun and dry filter for particulate matter overspray control, and exhausting at two (2) stacks identified as SV-14 and SV-15.
- (b) One (1) production area constructed July 16, 1998, producing a maximum of 195 fiberglass truck caps per day and consisting of:
 - (1) One (1) chop booth equipped with one (1) flow coater chop gun exhausting at two (2) stacks identified as SV-1 and SV-2, and
 - (2) One (1) gel coat application booth equipped with a high volume low pressure (HVLP) spray application system consisting of three (3) spray guns for color changes, using only one (1) gun at a time, with dry filter for particulate matter overspray control, and exhausting at one (1) stack identified as SV-3.
- (c) One Plant #2 Grind Booth for miscellaneous cutting and sanding operations for fiberglass and wood, constructed July 16, 1998, processing 730 pounds of product per hour, consisting of twelve (12) DA sanders, six (6) buffers, three (3) hand cutters, two (2) band saws, and two (2) table saws, exhausting at one (1) stack identified as SV-7.
- (d) Adhesive application area identified as ADH-02, installed in April 2002, equipped with a high volume low pressure (HVLP) spray application system consisting of two (2) application guns for adhesive application with dry filter for particulate overspray control, and exhausting at two (2) stacks identified as ADV-03 and ADV-04.

Plant #3 (28706 Holiday Place Drive):

- (a) One (1) mold repair area consisting of three (3) fiberglass mold production booths, constructed July 16, 1998, producing a maximum of 12 molds per week, equipped with one (1) HVLP spray gun, one (1) non-atomized spray gun, and one (1) flow coater chop gun, with dry filter for particulate matter overspray control, and exhausting at three (3) stacks SV-16 through SV-18.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including two (2) Safety-Kleen wash tanks each at a capacity of 660 gallons and containing pure grade lacquer thinner. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment and welding equipment, including two (2) welders. [326 IAC 6-3-2]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22); and
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

C.21 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e)] [40 CFR 63.56(a)] [40 CFR 63.9(b)] [326 IAC 2-7-12]

- (a) The Permittee shall submit a Part 2 MACT Application in accordance with 40 CFR 63.52(e)(1). The Part 2 MACT Application shall meet the requirements of 40 CFR 63.53(b).
- (b) Notwithstanding paragraph (a), the Permittee is not required to submit a Part 2 MACT Application if the Permittee no longer meets the applicability criteria of 40 CFR 63.50 by the application deadline in 40 CFR 63.52(e)(1). For example, the Permittee would not have to submit a Part 2 MACT Application if, by the application deadline:
 - (1) The source is no longer a major source of hazardous air pollutants, as defined in 40 CFR 63.2;
 - (2) The source no longer includes one or more units in an affected source category for which the U.S. EPA failed to promulgate an emission standard by May 15, 2002; or
 - (3) The MACT standard or standards for the affected source categories included at the source are promulgated.

- (c) Notwithstanding paragraph (a), pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The initial notification shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

The following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including two (2) Safety-Kleen wash tanks each at a capacity of 660 gallons and containing pure grade lacquer thinner. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment and welding equipment. [326 IAC 6-3-2]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

Process Weight Activities

D.4.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour. This includes the following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment and welding equipment.

Degreasing Operations

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.2 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning operations constructed after January 1, 1980, the owner or operator shall ensure that the following requirements are met for each of the two (2) 660 gallon Safety-Kleen wash tanks:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

SECTION D.5

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Plant #1 (57784 C. R. 3):

- (i) Adhesive application area identified as ADH-01, installed in April 2002, equipped with a high volume low pressure (HVLP) spray application system consisting of two (2) application guns for adhesive application with dry filter for particulate overspray control, and exhausting at two (2) stacks identified as ADV-01 and ADV-02.

Plant #2 (57784 C. R. 3):

- (d) Adhesive application area identified as ADH-02, installed in April 2002, equipped with a high volume low pressure (HVLP) spray application system consisting of two (2) application guns for adhesive application with dry filter for particulate overspray control, and exhausting at two (2) stacks identified as ADV-03 and ADV-04.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Any change or modification which may increase potential VOC usage to twenty-five (25) tons per year at the two (2) adhesive application areas combined, shall require prior approval from the Office of Air Quality (OAQ) before such change can occur.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

There are no compliance monitoring requirements specifically applicable to these facilities.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.2 Record Keeping Requirements

- (a) To document compliance with Condition D.5.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.5.1.
- (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) The cleanup solvent usage for each month; and
 - (4) The total VOC usage for each month.

- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

There are no reporting requirements specifically applicable to these facilities.

**Indiana Department of Environmental Management
Office of Air Quality**

Technical Support Document (TSD) for a
Minor Source Modification and Minor Permit Modification to a
Part 70 Operating Permit

Source Background and Description

Source Name:	Covermaster, Inc.
Source Location:	57784 C.R. 3, Elkhart, Indiana 46517
County:	Elkhart
SIC Code:	3799
Operation Permit No.:	T039-7354-00137
Operation Permit Issuance Date:	April 18, 2001
Minor Source Modification No.:	039-16534-00137
Minor Permit Modification No.:	039-16925-00137
Permit Reviewer:	Michael Hirtler / EVP

The Office of Air Quality (OAQ) has reviewed a modification application from Covermaster, Inc. relating to the operation of this stationary fiberglass truck cap and component manufacturing source.

History

On December 3, 2002, Covermaster, Inc. submitted an application to the OAQ requesting a source and permit modification to increase adhesive usage at the two (2) existing adhesive application areas. Covermaster, Inc. was issued a Part 70 Operating Permit on April 18, 2001.

Explanation of Modification Requested

The modification relates to the increased adhesive usage at the two (2) existing adhesive application process areas at this source. Prior to this approval, the adhesive application processes were considered insignificant activities, but are now considered significant activities as follows:

Plant #1 (57784 C. R. 3):

Adhesive application area identified as ADH-01, installed in April 2002, equipped with a high volume low pressure (HVLP) spray application system consisting of two (2) application guns for adhesive application with dry filter for particulate overspray control, and exhausting at two (2) stacks identified as ADV-01 and ADV-02.

Plant #2 (57784 C. R. 3):

Adhesive application area identified as ADH-02, installed in April 2002, equipped with a high volume low pressure (HVLP) spray application system consisting of two (2) application guns for adhesive application with dry filter for particulate overspray control, and exhausting at two (2) stacks identified as ADV-03 and ADV-04.

Existing Approvals

The source was issued Part 70 Operating Permit No. 039-7354-00137 on April 18, 2001. The source has since received the following:

- (a) First Administrative Amendment No. 039-15743, issued on April 11, 2002.
- (b) Second Administrative Amendment No. 039-16135, issued on July 3, 2002.

The source has since been operating under these approvals.

(Note: Significant Source Modification No. 039-12770-00137, issued on January 26, 2001, is listed on the cover page to each of Administrative Amendment Nos. 039-15743 and 039-16135. However, it is not listed on the cover pages to the respective subject Minor Source and Minor Permit Modifications 039-16534 and 039-16925. The conditions of Significant Source Modification No. 039-12770-00137 were already included in the Part 70 permit upon its April 18, 2001 issuance, and additional listing of the modification on cover pages of subsequent approvals is unnecessary.)

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (inches)	Flow Rate (acfm)	Temperature (°F)
ADV-01	Plant 1 adhesive application area	6	30	10,955	ambient
ADV-02	Plant 1 adhesive application area	6	30	10,955	ambient
ADV-03	Plant 2 adhesive application area	6	30	10,955	ambient
ADV-04	Plant 2 adhesive application area	6	30	10,955	ambient

Recommendation

The staff recommends to the Commissioner that the Minor Source and Minor Permit Modifications be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on December 3, 2002.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (two (2) pages).

Potential To Emit Before Controls for the Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the potential to emit (PTE) before controls for the modification. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	1.19
PM-10	1.19
SO ₂	0.00
VOC	19.02
CO	0.00
NO _x	0.00

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
toluene	7.13
hexane	3.09
TOTAL	10.22

Justification for Modification

The Part 70 operating permit is being modified through both a Part 70 Minor Source Modification and Minor Permit Modification. These modifications are being performed based on the following justification:

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of volatile organic compounds (VOC) is equal to or greater than 10 tons per year, but less than 25 tons per year. Therefore, this modification is being performed pursuant to 326 IAC 2-7-10.5(d)(4)(B).
- (b) The proposed operating conditions shall be incorporated into the Part 70 Operating Permit as a Minor Permit Modification (No. 039-16925-00137) in accordance with 326 IAC 2-7-12(b)(1). The Minor Permit Modification will give the source approval to operate the proposed emission units.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) is a precursor for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Elkhart County has been classified as attainment or unclassifiable for the remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects calendar year 2000 emissions, based upon the Indiana Air Emission Summary Data for criteria pollutants and the Toxic Release Report maintained by the IDEM Office of Pollution Prevention and Technical Assistance.

Pollutant	Emissions (ton/yr)
PM	0.3
PM10	0.3
SO ₂	0.0
VOC	103.2
CO	0.0
NO _x	0.0
single HAP (styrene)	60.1
total HAPs	60.1

Existing Source Status

Existing Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	3.1
PM10	3.1
SO ₂	0.0
VOC	<333.3
CO	5.2
NO _x	6.4
single HAP	>10
total HAPs	>25

- (a) This existing source is a major stationary source because at least one attainment regulated pollutant is emitted at, or has the potential to emit at, a rate of 250 tons per year.
- (b) These emissions are based upon the Technical Support Documents to Significant Source Modification No. 039-12770-00137, issued on January 26, 2001, and Part 70 Permit No. 039-7354-00137, issued on April 18, 2001.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

	Potential to Emit of Modification After Issuance (tons/year)						
Process/emission unit	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Plants 1 & 2 adhesive application areas ADH-01 & ADH-02	1.19	1.19	0.00	19.02	0.00	0.00	10.22
PSD Threshold Level	25	15	40	40	100	40	N/A

	Potential to Emit (PTE) of Source After Issuance (tons/year)						
Process/emission unit	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Existing Plant 1 facilities B-1 (resin booth), B-2 (gel booth), B-5 (mold booth), & paint booth (B-6)	2.2	2.2	0.0	#138.0*	0.0	0.0	>10 (single) >25 (total)
Existing Plant 1 facilities B-7 (gel booth) & B-8 (resin booth)	0.8	0.8	0.0	<100*	0.0	0.0	>10 (single) >25 (total)
Existing Plants 2 & 3 facilities (1 paint booth; 3 mold booths, 1 gel booth & 1 resin booth)	0.4	0.4	0.0	<95.3*	0.0	0.0	>10 (single) >25 (total)
Existing natural gas combustion as an insignificant activity	0.1	0.5	0.0	0.4	5.2	6.4	0.1
Total PTE for Source after Issuance	4.69	5.09	0.00	<352.7	5.20	6.40	>10 (single) >25 (total)
Part 70 Threshold Level	100	100	100	100	100	100	10 (single) 25 (total)

* Existing permit limits.

- (a) This modification to an existing major stationary source is not major because the emission increase after the modification is less than the PSD threshold levels. Therefore, pursuant to 326 IAC 2-2 and 40 CFR 52.21, the PSD requirements continue to not apply.
- (b) This modification to the existing Part 70 source will not change the status of the stationary source because the emissions from the entire source will continue to be greater than the Part 70 major source thresholds.

Federal Rule Applicability

- (a) The potential to emit a hazardous air pollutant (HAP) due to this modification is less than 10 tons per year for a single HAP and less than 25 tons per year for the combination of HAPs. However, the requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are applicable to this source, inclusive of this modification, because the source is a major source of HAPs (i.e., the source has the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAPs) and the source includes one or more units that belong to one or more source categories affected by the Section 112(j) Maximum Achievable Control Technology (MACT) Hammer date of May 15, 2002.
 - (1) This rule requires the source to:
 - (A) Submit a Part 1 MACT Application by May 15, 2002; and
 - (B) Submit a Part 2 MACT Application within twenty-four (24) months after the Permittee submitted a Part 1 MACT Application.
 - (2) The Permittee submitted a Part 1 MACT Application on April 29, 2002. Therefore, the Permittee is required to submit the Part 2 MACT Application on or before April 29, 2004. Note that on April 25, 2002, Earthjustice filed a lawsuit against the US EPA regarding the April 5, 2002 revisions to the rules implementing Section 112(j) of the Clean Air Act. In particular, Earthjustice challenged the US EPA's 24-month period between the Part 1 and Part 2 MACT Application due dates. The U.S. EPA and Earthjustice filed a settlement agreement on November 26, 2002. Proposed rule amendments based on this settlement agreement were published in the December 9, 2002 Federal Register. It appears that U.S. EPA intends to establish a phased schedule for promulgating all of the remaining MACT standards, resulting in four Part 2 MACT Application deadlines. Under the proposed amendments, some Part 2 MACT Applications would be due as early as May 15, 2003.
 - (3) Pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The MACT and the General Provisions of 40 CFR 63, Subpart A will become new applicable requirements, as defined by 326 IAC 2-7-1(6), that must be incorporated into the Part 70 permit. After IDEM, OAQ receives the initial notification, any of the following will occur:
 - (A) If three or more years remain on the Part 70 permit term at the time the MACT is promulgated, IDEM, OAQ will notify the source that IDEM, OAQ will reopen the permit to include the MACT requirements pursuant to 326 IAC 2-7-9; or

- (B) If less than three years remain on the Part 70 permit term at the time the MACT is promulgated, the Permittee must include information regarding the MACT in the renewal application, including the information required in 326 IAC 2-7-4(c); or
 - (C) The Permittee may submit an application for a significant permit modification under 326 IAC 2-7-12 to incorporate the MACT requirements. The application may include information regarding which portions of the MACT are applicable to the emission units at the source and which compliance options will be followed.
- (b) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
 - (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 61, and 326 IAC 20 and 40 CFR Part 63) applicable to this source modification.
 - (d) This modification does not involve a pollutant-specific emissions unit with the potential to emit after control in an amount equal to or greater than 100 tons per year. Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This existing source is a major stationary source because at least one attainment regulated pollutant (i.e., VOC) has the potential to emit at a rate of 250 tons per year. This modification to an existing major stationary source is not major because the emissions increase is less than the applicable PSD significant threshold levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

326 IAC 2-6 (Emission Reporting)

This source is still subject to 326 IAC 2-6 (Emission Reporting) after this modification, because the source has the potential to emit more than ten (10) tons per year of volatile organic compounds and it is located in Elkhart County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1-1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of the combination of HAPs, and is constructed or reconstructed after July 27, 1997, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT).

Pursuant to 40 CFR 63.41, this modification to the two (2) existing adhesive application facilities ADH-01 and ADH-02 is not considered a reconstruction because the cost to increase capacity at each facility does not equal or exceed 50% of the cost to construct new comparable processes. Also, the modification does not in and of itself have the PTE single and combined HAPs in respective amounts of 10 tons and 25 tons per 12 consecutive month period. Therefore, the requirements of 326 IAC 2-4.1-1 do not apply.

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

The Permittee has indicated that the adhesive applied to the interior truck cap surfaces does not emit particulate. The adhesive is characterized as a stringy material of large "droplet" size, which is not considered particulate per 326 IAC 6-3-1.5(3). The application of adhesive is not considered as *surface coating*, pursuant to 326 IAC 6-3-1.5(5), since there is no potential to emit particulate; therefore 326 IAC 6-3 does not apply to the adhesive application area. Nonetheless, it is noted that the existing dry filters will remain in place at each facility, but there will be no specific compliance monitoring nor preventive maintenance plan requirements applicable to these two (2) facilities.

326 IAC 8-1-6 (General Reduction Requirements)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have potential volatile organic compound (VOC) emissions of 25 tons per year or more, and which are not otherwise regulated by another provision of Article 8.

The Plant 1 and Plant 2 adhesive application areas have a total combined potential to emit of VOC that is less than 25 tons per year after this modification. Therefore, the requirements of 326 IAC 8-1-6 do not apply to either facility and records will be kept of VOC usage to verify this status.

There are no other Article 8 requirements applicable to this modification

Testing Requirements

Compliance testing is not required of this modification since the surface coating material usage assumes a VOC emission factor of 2,000 pounds of VOC emitted per ton of VOC input to the coating operation.

Compliance Requirements

There are no new compliance requirements applicable to the source due to this modification.

Changes to the Part 70 Permit Due to This Modification:

The following changes are made as the first Significant Source/Permit Modification to Part 70 No. 039-7354-00137. New language is shown in **bold** and deleted language is shown with a ~~line through it~~ for emphasis). The Table of Contents is also revised as necessary, without replication herein.

1. Section A.2 is revised to add the Plant 1 and Plant 2 adhesive application processes. Section A.3 and the Section D.4 facility description box is likewise revised to delete reference to these same facilities, which were considered as insignificant activities prior to this modification.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices, which are separated listed under three (3) groups identified by the source as Plant #1 and Plant #2, corresponding to onsite production Buildings #1 and #2, which are both located at 57784 C.R. 3, and Plant #3, which is located in an adjacent building at 28706 Holiday Place Drive:

Plant #1 (57784 C. R. 3):

- (i) **An adhesive application area, installed in April 2002, equipped with a high volume low pressure (HVLP) spray application system consisting of two (2) application guns for adhesive application with dry filter for particulate overspray control, and exhausting at two (2) stacks identified as ADV-01 and ADV-02.**

Plant #2 (57784 C. R. 3):

- (d) **An adhesive application area, installed in April 2002, equipped with a high volume low pressure (HVLP) spray application system consisting of two (2) application guns for adhesive application with dry filter for particulate overspray control, and exhausting at two (2) stacks identified as ADV-03 and ADV-04.**

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including two (2) Safety-Kleen wash tanks each at a capacity of 660 gallons and containing pure grade lacquer thinner. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment and welding equipment, including two (2) welders. [326 IAC 6-3-2]

- ~~(c) Other operations with emissions below significant thresholds: two (2) adhesive application processes.~~

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

The following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including two (2) Safety-Kleen wash tanks each at a capacity of 660 gallons and containing pure grade lacquer thinner. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment and welding equipment. [326 IAC 6-3-2]
- ~~(c) Other operations with emissions below significant thresholds: two (2) adhesive application processes.~~

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

2. New Section D.5 is added to the permit to include the requirements for the two (2) adhesive coating facilities, now as significant activities. IDEM, OAQ, decided to include the requirements for these facilities in a new Section D.5, rather than make changes to existing conditions elsewhere in the permit, for greater clarity in terms of the new requirements.

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Plant #1 (57784 C. R. 3):

- (i) An adhesive application area, installed in April 2002, equipped with a high volume low pressure (HVLP) spray application system consisting of two (2) application guns for adhesive application with dry filter for particulate overspray control, and exhausting at two (2) stacks identified as ADV-01 and ADV-02.

Plant #2 (57784 C. R. 3):

- (d) An adhesive application area, installed in April 2002, equipped with a high volume low pressure (HVLP) spray application system consisting of two (2) application guns for adhesive application with dry filter for particulate overspray control, and exhausting at two (2) stacks identified as ADV-03 and ADV-04.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Any change or modification which may increase potential VOC usage to twenty-five (25) tons per year at the two (2) adhesive application areas combined, shall require prior approval from the Office of Air Quality (OAQ) before such change can occur.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

There are no compliance monitoring requirements specifically applicable to these facilities.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.2 Record Keeping Requirements

- (a) To document compliance with Condition D.5.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.5.1.
- (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) The cleanup solvent usage for each month; and
 - (4) The total VOC usage for each month.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

There are no reporting requirements specifically applicable to these facilities.

3. IDEM, OAQ has decided to insert new Condition C.21 into the permit. The Permittee already submitted the applicable Part 1 MACT Application on April 29, 2002, and is generally aware of the Section 112(j) requirements. However, Condition C.21 will specifically delineate the requirements for MACT standard compliance.

**C.21 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e)]
[40 CFR 63.56(a)] [40 CFR 63.9(b)] [326 IAC 2-7-12]**

- (a) The Permittee shall submit a Part 2 MACT Application in accordance with 40 CFR 63.52(e)(1). The Part 2 MACT Application shall meet the requirements of 40 CFR 63.53(b).
- (b) Notwithstanding paragraph (a), the Permittee is not required to submit a Part 2 MACT Application if the Permittee no longer meets the applicability criteria of 40 CFR 63.50 by the application deadline in 40 CFR 63.52(e)(1). For example, the Permittee would not have to submit a Part 2 MACT Application if, by the application deadline:
- (1) The source is no longer a major source of hazardous air pollutants, as defined in 40 CFR 63.2;
- (2) The source no longer includes one or more units in an affected source category for which the U.S. EPA failed to promulgate an emission standard by May 15, 2002; or
- (3) The MACT standard or standards for the affected source categories included at the source are promulgated.
- (c) Notwithstanding paragraph (a), pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The initial notification shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Conclusion

This proposed modification to the fiberglass truck cap and component manufacturing source shall be subject to the conditions of the attached Part 70 Minor Source Modification No. 039-16534-00137 and Part 70 Minor Permit Modification No. 039-16925-00137.

**Appendix A: Emission Calculations
Hazardous Air Pollutants (HAPs)
From Surface Coating Operations and Solvent Usage**

Company Name: Covermaster, Inc.
Address City IN Zip: 57784 C.R. 3, Elkhart, Indiana 46517
Minor Source Modification No.: 039-16534-00137
Minor Permit Modification No.: 039-16925-00137
Part 70 No.: 039-7354-00137
Reviewer: Michael Hirtler / EVP
Date: December 18, 2002

Uncontrolled Potential to Emit																				
Material (as applied)	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % toluene	Weight % hexane	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	HAP Emission Rates (tons per year)								
												toluene	hexane							
Facility: Sub-Assembly Area																				
CON-BOND adhesive	6.70	0.54	1.50	30.00%	13.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	7.13	3.09	0.00	0.00	0.00	0.00	10.22		
Total Uncontrolled Potential to Emit (tons per year):												7.13	3.09	0.00	0.00	0.00	0.00	0.00	0.00	10.22
Total Controlled/Limited Potential to Emit (tons per year):												7.13	3.09	0.00	0.00	0.00	0.00	0.00	0.00	10.22

Methodology:

Uncontrolled Potential HAP Emission Rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Limited Potential HAP Emission Rate (tons/yr) = Uncontrolled Potential HAP Emission Rate * Coating Material Input Limit (such that single HAP emissions <10 tpy and total HAP emissions < 25 tpy)

Appendix A: Emission Calculations
VOC and Particulate
From Spray Painting Operations

Company Name: Covermaster, Inc.
Address City IN Zip: 57784 C.R. 3, Elkhart, Indiana 46517
Minor Source Modification No.: 039-16534-00137
Minor Permit Modification No.: 039-16925-00137
Part 70 No.: 039-7354-00137
Reviewer: Michael Hirtler / EVP
Date: December 18, 2002

Potential Uncontrolled Emissions:																	
Coating Material	Type of Product Being Coated	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	Ib VOC /gal solids	Transfer Efficiency
<i>Adhesive Application for Plants 1 & 2</i> CON-BOND adhesive	fiberglass	6.70	80.00%	0.00%	80.00%	0.00%	0.00%	0.54	1.50	5.36	5.36	4.34	104.20	19.02	0.00	ERR	100%
Total Uncontrolled Potential to Emit (tons per year):												4.34	104.20	19.02	0.00		
Total Controlled/Limited Potential to Emit (tons per year):										12-mos Input Usage Limit (VOC)	Control Efficiency (PM)	Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr		
										0.00%	94.00%	4.34	104.20	19.02	0.00		

Methodology:

PM transfer efficiency set equal to 100%, as the source has indicated that this material does not result in particulate, pursuant to 326 IAC 6-3-1.5(3).

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids) * Transfer Efficiency
Total Uncontrolled Potential Emissions = Worst Case Coating + all Solvents Applied
Controlled VOC Emission Rate = Uncontrolled Emission Rate * VOC Input Limitation
Controlled PM Emission Rate = Uncontrolled Emission Rate * VOC Input Limitation * (1 - PM Control Efficiency)